PLAINTIFF'S EXHIBIT NO. 215

United States District Court Northern District of California No. 12-CV-00630-LHK (PSG)

Apple Inc. v. Samsung Elecs.

Date Admitted: By:

Todd Pendleton Friday, October 07, 2011 6:46 PM Michael Pennington; Dale Sohn Brian Rosenberg; Seung Hyun Choi; Brian Wallace; Joanne Lovato; Ji-Ung Park Subject: RE: Use Google to attack Apple?

Hey Michael,

From:

Sent:

To: Cc:

We are going to execute what you are recommending in our holiday GSII campaign and go head to head with iphone 4s.

We are working on a very aggressive strategy touting our advantages in hardware and software.

In the process we will demystify the perceived Apple advantage (ecosystem/services) by showing how consumers can easily switch to Android and have more personalization/more choice by being part of the Samsung ecosystem.

More to come soon...

Best, TP

From: Michael Pennington Sent: Friday, October 07, 2011 8:28 PM To: Dale Sohn; Todd Pendleton Cc: Brian Rosenberg; Seung Hyun Choi Subject: RE: Use Google to attack Apple?

Looking deeper into iPhone 4S, it is clear Apple is not worried about us as a hardware competitor, which is where we are focusing. They are continuing to focus on the USER EXPERIENCE, which ultimately puts Google in the center of the target. I only bring this up because I passionately believe we must do something now, with or invisibly behind Google, to establish our collective advantages in consumer's minds.

Example: Google's core strength, Search Engine, can be radically minimized by Apple's new iPhone 4S implementation of Siri. See Google's "Burning Platform" issue below. I took this from a CNET article.

"""...But when roughly 66 percent of your mobile search traffic comes from a platform that now has an "intelligent assistant" making its own queries without the help of Google, a strategy change may be in the cards sooner than later. So far, Google is remaining mum on Siri."""

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My point is, Google must be as motivated as we should be at this point.

Unfortunately, Steve Job's passing has led to a huge wave of press coverage of Apple's and iPhone's "superiority", all created by the, "passionate, tireless, perfectionist..." The point here is that there is an unintended benefit for Apple, since the external messages by 3rd parties are all highlighting and/or supporting the consumer perception that Apple products are superior, since Jobs' was such a visionary and perfectionist. What consumer wouldn't feel great about purchasing a device developed by such a person.

Sorry to continue to push this issue, but I have seen this far too long and I know this is our best opportunity to attack iPhone. If there is no consensus on the approach I initially proposed, I will stop pushing, but I would like to better understand our strategy so I can align with that.

Regards,

Mike

From: Dale Sohn
Sent: Tuesday, October 04, 2011 5:15 PM
To: Michael Pennington; Todd Pendleton
Cc: Brian Rosenberg; Seung Hyun Choi
Subject: RE: Use Google to attack Apple?

Mike,

Thank you for sharing your thoughts on this. We need to take advantage of this chance. One company without core competence cannot generate continuous innovation. Time is coming now. Dale

From: Michael Pennington
Sent: Tuesday, October 04, 2011 5:09 PM
To: Dale Sohn; Todd Pendleton
Cc: Brian Rosenberg; Seung Hyun Choi
Subject: Use Google to attack Apple?

Dale,

Below is a Fierce Wireless table showing a limited spec comparison with the new iPhone 4S. Obviously, we continue to have better products/specs available in the marketplace. As you have shared previously, we are unable to battle them directly in our marketing. If it continues to be Samsung's position to avoid attacking Apple due to their status as a large customer, can we go to Google and ask them to launch a campaign against Apple, based on the many better Android options available in the market for Q4.

Many customers have been waiting to upgrade to the new version, so timing is critical. Now that Apple is potentially disappointing their loyal customer base, we must communicate the numerous better options available.

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Seems Google should be asked to carry their own weight in this battle. However, we could arrange a co-op arrangement for them if they use or device prominently in their marketing campaign. Is Ice Cream Sandwich strong enough to go head to head with iOS 5?

I believe this type of campaign is long overdue.

Regards, Mike

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| | Chart: i | Phone | 4S vs. ' | the con | npetition | | | |
| | | iPhone 4S | Samsung Galazy S II | Blackberry Bold 9900 | HTC Titan | Motorola Droid Bionic | ? Nexus Prime | P Nokias' first Windows Phone |
| | os | iOS 5 | Android 2.3 | BlackBerry 7 | Windows Phone 7.5 | Android 2.3 | Android 4? | Windows Phone 7.5? |
| | Processor | Apple A5 dual-core | Samsung 1.2 GHz dual-core | 1.2 GHz Qualcomm | 1.5 GHz Qualcomm Snapdragon | 1 GHz dual- core Texas Instruments | 7 | Ş |
| | Wireless | HSPA+ 14.4/EV- DO Rev. A | HSPA+ 21/EV-DO Rev. A | HSPA+ 14.4/EV-DO Rev. A | HSPA+ 14.4 | EV-DO Rev. A/LTE | ? | ? |
| | Lowest price (on contract) | \$199 | \$199 | Varies | Unnannounced | \$299 | 7 | Ś |
| | U.S. Carriers | AT&T, Verizon, Sprint | AT&T, Sprint, T- Mobile | Verizon, Sprint, T- Mobile | AT&T | Verizon | 7 | ć |
| | | Siri voice control and 8-MP camera | Slim design, bright screen | Upgraded OS and "liquid graphics" | 4.7-inch screen and slim design | The fastest Android phone with LTE | While it's only a rumor so far, the device could | While Nokia hasn't announced anything yet, many expect the |

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